

April 02, 2015

National Credit Union Administration  
Gerald Poliquin, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Comments on Proposed Rule 791 and IRPS 15-1

Dear Gerald Poliquin,

I am writing on behalf of the Cal Poly Federal Credit Union, which serves the students, staff, faculty and alumni of California State Polytechnic University, Pomona. We have 2,600 Members and \$12 million in assets. Cal Poly FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the small entity definition.

We support the proposal that would amend NCUA's definition of small entity for Regulatory Flexibility Act analysis by increasing the asset threshold from \$50 million to \$100 million.

Frankly, we believe the asset threshold should mimic the FDIC's at \$550 million.

But, there is no way NCUA's Office of Small Credit Union Initiatives (OSCUI) could service the needs of credit unions up to \$100 million (let alone \$550 million) without significant growth to their Budget. It seems that these are two different matters -- regulatory relief is one item and very different from small credit union's needs for OSCUI services.

In summary, we believe the definition for small entity when it relates to Regulatory Flexibility should have an asset threshold of \$550 million. But, the services of OSCUI should be limited to credit unions with up to \$50 million in assets,

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on the proposed amendment.

Sincerely,

Barbara Bean  
CEO  
Cal Poly FCU

cc: CUNA, CCUL